

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

KEVIN GREEN, JULIAN PEREZ, and
NICK CIECHALSKI

Plaintiffs,

v.

Civil No. 23-cv-1166LJV(F)

CITY OF BUFFALO,
BATTALION CHIEF RONALD K. BOURGEOIS,
COMMISSIONER WILLIAM RENALDO, DEPUTY
COMMISSIONER RAMO SUAREZ and
MAYOR BYRON BROWN

Defendants.

DECLARATION OF JOSHUA B. LEVITT

Joshua B. Levitt, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. I am an attorney with Hodgson Russ LLP, counsel for Defendants City of Buffalo, Battalion Chief Ronald K. Bourgeois, Commissioner William Renaldo, Deputy Commissioner Ramon Suarez (improperly sued here as “Ramo Suarez”), and Mayor Byron Brown, (collectively “Defendants”). I am fully familiar with the facts, circumstances, pleadings and proceedings in the above referenced matter.

2. I submit this Declaration in response to Plaintiffs’ motion to amend their complaint, only to advise that Defendants do not oppose Plaintiffs’ motion to file the proposed Amended Complaint.

Dated: March 29, 2024

/s/ Joshua B. Levitt
Joshua B. Levitt